The Applicants respectfully traverse these rejections based on the points set forth below.

The Applicants respectfully submit that DiGiorgio fails to disclose the features recited in claim 1 of:

(1) separating encapsulated APDUs from message packets that are received from a remote computer system and routing the separated APDUs to a PSD and

(2) encapsulating APDUs received from a PSD interface into message packets that are communicated to the remote computer system.

The Final Rejection cites DiGiorgio's disclosure of "[w]hen a user attempts to access ISP services from the token device, the ISP issues a challenge to the token device to ensure that the user should be granted access to the ISP services" and proposes that this is identical to above-noted claimed feature (1) (see Final Rejection section 6, lines 8-15). Simply stated, the Final Rejection proposes that issuing a challenge from an ISP to a token device is identical to the Applicants' claimed feature of separating encapsulated APDUs from message packets that are received from a remote computer system and routing the separated APDUs to a PSD.

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However, issuing a challenge from an ISP to a token device via a client terminal does not expressly describe or inherently require that:

(a) the challenge issued by the ISP be in the form of APDUs that are encapsulated in message packets;

(b) the client terminal interfacing the token device to the ISP separates the APDUs from the message packets received from the ISP; <u>or</u>

(c) the client terminal communicates the separated APDUs (i.e., the <u>identical</u> APDUs encapsulated by the ISP into message packets) to the token device.

Thus, the Applicants respectfully submit that DiGiorgio fails to disclose the Applicants' claimed feature of separating encapsulated APDUs from message packets that are received from a remote computer system and routing the separated APDUs to a PSD.

With regard to above-noted claimed feature (2), the Final Rejection notes that DiGiorgio's discloses "[o]nce the challenge is received at the token device, the token device issues a response to the ISP challenge in the form shown in Figure 8B" and proposes that this is identical to above-noted claimed feature (2) (see Final Rejection page 4, lines 1-6). Simply put, the Final Rejection proposes that issuing a response from the token device in the form of APDUs is identical to encapsulating APDUs

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received from a PSD interface into message packets that are communicated to a remote computer system.

However, issuing a response in the form of APDUs from a token device to an ISP only requires that the token device issues APDUs. This proposed disclosure does not expressly describe or inherently require that:

(d) an intermediary client terminal interfacing the token device and ISP encapsulates the APDUs received from the token device (i.e., the identical APDUs communicated by the token device) into message packets; or

(e) the client terminal communicates the encapsulated APDUs to the ISP.

Thus, the Applicants respectfully submit that DiGiorgio fails to disclose the claimed feature of encapsulating APDUs received from a PSD interface into message packets that are communicated to a remote computer system.

The remarks presented in the Applicants' Response dated December 5, 2005, provide a detailed description of DiGiorgio's disclosure with respect to above-noted features (1) and (2), and these remarks are incorporated herein by reference for brevity and completeness. To exemplify why DiGiorgio does not inherently disclose the above-noted characteristics (a) through (e), the Applicants offer the following additional remarks.

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DiGiorgio does not expressly or inherently disclose an ISP that issues a challenge in the form of APDUs. Thus, if DiGiorgio's ISP issues the challenge in a form other than APDUs, then characteristics (a) through (c) cannot be achieved by DiGiorgio's system.

DiGiorgio does not expressly or inherently disclose a client terminal that necessarily does not process a received challenge in any way. Thus, if DiGiorgio's client terminal processes the received challenge, such as (i) to convert ASCII characters representing the word challenge into a number that the token device interprets to mean a challenge or (ii) to convert a received APDU into a different APDU, then DiGiorgio's system cannot achieve characteristics (b) and (c).

DiGiorgio does not expressly or inherently disclose a client terminal that necessarily does not process a received response to a challenge in any way. Thus, if DiGiorgio's client terminal processes a token device's response to the challenge, such as described in the preceding paragraph, then DiGiorgio's system cannot achieve characteristics (d) and (e).

DiGiorgio does not expressly or inherently disclose a client terminal that communicates APDUs to an ISP. Thus, if DiGiorgio's client terminal does not communicate APDUs to the ISP, DiGiorgio's system cannot achieve characteristic (e).

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In summary, DiGiorgio does not disclose the features recited in claim 1 of generating a communications pipe between a PSD and a remote computer system over a network by: (1) directly encapsulating APDUs coming from a PSD interface of a client into outgoing message packets sent to the remote computer system over the network and (2) directly routing, to the PSD interface, APDUs that are desencapsulated by the client from messages received from the remote computer system over the network.

Accordingly, the Applicants submit that DiGiorgio does not anticipate the subject matter defined by claim 1.
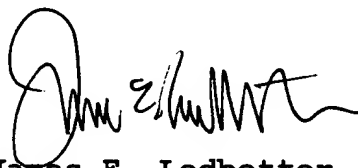
Independent claims 20, 29, and 42 similarly recite the above-described features distinguishing apparatus claim 1 from DiGiorgio, but with respect to methods. Therefore, the obviousness rejections applied to claims 18 and 40 are obviated, and allowance of claims 1, 20, 29, and 42 and all claims dependent therefrom is warranted.

A Terminal Disclaimer is submitted herewith to overcome the provisional obviousness-type double patenting rejections set forth in Sections 10 and 15.

In view of the above, it is submitted that this application is in condition for allowance, and a notice to that effect is respectfully solicited.

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If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

Date: December 19, 2006
JEL/DWW/att

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